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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Caption in Compliance with D.N.J. LBR 9004-1(a) | |
| Vedder Price P.C. Fleming L. Ware, Esq. 1633 Broadway, 31st Floor New York, New York 10019 Tel: (212) 407-6980 Fax: (212) 407-7799 Email: fware@vedderprice.com | |
| <i>Counsel to Creditor</i> <i>Komatsu Financial Limited Partnership</i> | |
| In Re: ASSUNCAO BROS., INC., Debtor. | Chapter 11 (Subchapter V) Case No. 22-16159-CMG Hon. Christine M. Gravelle |

APPLICATION TO APPEAR PRO HAC VICE

Fleming L. Ware, (the “Movant”) a member in good standing of the bar of the U.S. District Court of the District of New Jersey, an associate at the firm of Vedder Price P.C., counsel for Komatsu Financial Limited Partnership (“Komatsu”), hereby moves the Court to enter an order permitting Kevin J. Etzel, to practice pro hac vice before the United States Bankruptcy Court for the District of New Jersey. In support of this Application, the Movant states as follows:

1. I agree to be responsible for the conduct of Mr. Etzel, and to ensure that he complies with the applicable rules.
2. Komatsu has requested that Mr. Etzel represent it in this litigation. Mr. Etzel is familiar with the facts, issues, and pleadings in this action, and no delay in the discovery,

motions, trial or any other proceeding will be occasioned by his *pro hac vice* admission in this matter.

3. For the reasons set forth in the accompanying Certification of Kevin J. Etzel, Esq., there is good cause for his *pro hac vice* admission.

4. On Mr. Etzel's behalf, I hereby request that he receive notification via electronic mail of all electronic filings in the above captioned action by delivering such notification to the e-mail address KEtzel@vedderprice.com.

5. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: New York, New York
August 18, 2022

Respectfully submitted,

VEDDER PRICE P.C.

By: /s/ Fleming L. Ware
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